



WILLIAM P. DENI, JR.
Director

Gibbons P.C.
One Gateway Center
Newark, New Jersey 07102-5310
Direct: (973) 596-4853 Fax: (973) 639-8373
wdeni@gibbonslaw.com

June 14, 2021

VIA ECF

Honorable Mark Falk, U.S.M.J.
United States District Court
District of New Jersey
U.S. Post Office & Courthouse Building
One Federal Square
Newark, New Jersey 07101

**Re: IN RE SUGAMMADEX,
Civil Action No. 20-2576 (CCC) (MF) (CONSOLIDATED)**

Dear Judge Falk:

This firm represents Plaintiffs in the above-referenced consolidated action. We write, jointly with counsel for Defendants, to respectfully request that the Court approve the following modifications to the Scheduling Order, ECF No. 50, that have been agreed to by all parties:

1. The deadline for substantial completion of document production shall be extended from June 18, 2021, to July 9, 2021;
2. The deadline to amend pleadings shall be extended from July 16, 2021, to August 6, 2021; and
3. The parties shall not serve additional document requests absent mutual agreement or good cause.

If the foregoing meets with the Court's approval, the parties respectfully request that the Court "So Order" this letter and have it filed on the docket. We thank the Court for its time and attention to this matter and remain available at the Court's convenience to address any questions or concerns.

Respectfully submitted,

s/ William P. Deni, Jr.
William P. Deni, Jr.

cc: All counsel of record (via ECF)